IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re: \$
Moise Arrah \$ CASE NO. 24-33095-H4-13
Debtor \$ Chapter 13

CHAPTER 13 TRUSTEE'S OBJECTION TO CONFIRMATION

David G. Peake, Chapter 13 Trustee, Objects to Confirmation of Debtor's Plan for the following reasons and upon the following grounds:

- 1. Debtor's plan is not feasible. Debtor does not appear to have sufficient income to support the proposed plan payments. Specifically, the Debtor has proposed step up plan payments with no apparent ability to fund the increased plan payments.
 - 2. Debtor's Plan does not comply with 11 U.S.C. § 1325(a)(3).

Wherefore, the Trustee requests the Court to deny confirmation of Debtor's plan, and to grant him such other and further relief to which he may be entitled.

Respectfully submitted,

David G. Peake, Chapter 13 Trustee

By: /s/ Richard W. Aurich, Jr. / TX Bar No. 00792339 9660 Hillcroft, Suite 430 Houston, TX 77096 713-283-5400 713-852-9084 (Fax) Attorney for David G. Peake, Chapter 13 Trustee

CERTIFICATE OF SERVICE

A copy of the above Objection to Confirmation was served on or about December 10, 2024, as indicated upon the following:

Moise Arrah US Mail

19218 West Austin Bayou Ct. Cypress, TX 77433

James T. Ferguson 1 Riverway, Ste 1700 Houston, TX 77056 CM/ECF electronic delivery (12/9/2024)

/s/ Richard W. Aurich, Jr.

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